NORLITE, LLC

628 SO. SARATOGA STREET
PO BOX 684
COHOES, NY 12047
PHONE: (518) 235-0401
FAX: (518) 235-0233

March 3, 2014

Ms. Nancy Baker
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report
Kiln 1: 02/13/14 – 02/20/14
Kiln 2: 02/13/14 – 02/20/14

Dear Sir/Madam:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite, LLC (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 02/13/14 thru 02/20/14. The attached document explains each of the "malfunctions" for Kilns One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. All of the stack gas cutoffs were attributed to either water droplets from the Mist Pad contacting the stack gas probe or water vapor in the stack condensing from the extreme cold and wind and contacting the stack gas probe. For both causes, the water contacting the probe caused it to fault. Attempts were made to adjust the ID fan speed to combat the water droplet movement without significant success. Norlite took Kiln 2 down on February 19, 2014 to conduct scrubber cleaning and repair as well as replace any damaged bags in the baghouse system. Also, as has been stated previously, Norlite has been working with the Department to approve the Optical Flow Sensor Technology for measuring flow rate in the kiln system. Norlite submitted a proposal to the Department on December 24, 2013 requesting approval to make the Optical Flow Sensor the certified technology for measuring stack gas flow on Kiln 1. On January 20, 2014, the Department granted Norlite permission to submit a permit modification which once approved would make the Optical Flow Sensor the certified technology on Kiln 1. Norlite has completed the final programming to calculate the velocity into standard cubic feet per minute and is currently preparing a permit modification request. Norlite should have the permit modification request completed with modified permit pages and submitted to the Department by March 11, 2014. Please see below for a history of the work completed thus far.

Norlite has been working to resolve stack gas span cutoffs in general for almost two years. Norlite has been working with the Department to install a new optical flow technology to monitor stack gas flow rate. A test unit has been installed on Kiln 1 and tested to obtain additional information to be used in future calculations. Norlite conducted an official RATA test on the optical flow sensor in Kiln 1 on November 26, 2013 which yielded very good results. The final RATA Testing report has been received by Norlite and submitted along with a proposal for implementing official use of the unit to the Department on December

24, 2013. Norlite is in the process of preparing and submitting a permit modification request for Department approval by March 11, 2014. After final approval is given for the unit on Kiln 1, Norlite will install a unit on Kiln 2 with an expedited schedule for completion which will hopefully see the unit in certified operation by the end of March 2014 or early April 2014.

Norlite has also been working with the Department to improve LGF delivery and handling at the kilns to address these types of cutoffs. In April 2013, the Department conditionally approved Norlite's plan to remove the minimum LLGF Line Pressure requirement, allow a positive displacement pump to be used for fuel flow control, and allow the use of a recirculation line for use during times when off LGF. The Department also requested a six month study be conducted without a minimum LLGF Line Pressure requirement. The study was started on May 01, 2103 and completed on October 31, 2013. Norlite conducted an extensive search for a positive displacement pump which would allow variable speed control, have tight pump tolerance, and have suitable reliability for long term use. The results of the six month study which summarized over 4 million lines of operational data between the two kilns was submitted to the DEC on December 5, 2013. Based from the results of the six month study, Norlite feels the data supports the removal of the minimum LLGF Line Pressure requirement. Norlite has concluded that a positive displacement pump which meets all the needed criteria does not exist. As stated previously, Norlite has acquired the assistance of a process engineering firm to assist in the search for a suitable positive displacement pump and conduct an overall review of the entire kiln feed system to provide a proposal for improving the kiln fuel feed system. The process engineering firm has been supplied with facility drawings, had several discussions with Norlite personnel, and taken a facility tour to better understand the facility operations as they relate to fuel delivery at the kilns. Norlite submitted a proposal provided by SPEC Engineering to the Department on December 31, 2013 for review and approval. The proposal was to use an automated control loop to control pressures and fuel flow rates at the kilns. On January 13, 2014, the Department approved the overall concept of the proposal with the requirement that additional engineering specifications be provided by certain dates for ultimate approval of the entire project.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tom.vanvranken@tradebe.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joseph Hadersbeck, NYSDEC – R4w/attachments
Jim Quinn, NYSDEC – R4 w/attachments
Tita LaGrimas – Tradebe

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/14/2014	11:12:44	2/14/2014	11:14:10	0:01:26	30	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
2/14/2014	13:13:42	2/14/2014	16:01:33	2:47:51	31	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure / High CO's	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
2/16/2014	2:15:46	2/16/2014	2:25:31	0:09:45	32	Malfunction	The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur, Affecting the Rear Chamber Differential Pressure System	Back Chamber Pressure	Span	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
2/16/2014	20:33:17	2/16/2014	20:34:35	0:01:18	33	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	20:46:57	2/16/2014	20:54:23	0:07:26	34	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	22:25:11	2/16/2014	22:25:36	0:00:25	35	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/17/2014	10:35:59	2/17/2014	11:42:40	1:06:41	36	Malfunction	The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure	Front Kiln Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements
2/19/2014	8:58:41	2/19/2014	9:36:55	0:38:14	37	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the South Affecting the Response of the Stack Gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/19/2014	9:56:53	2/19/2014	10:06:20	0:09:27	38	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the South Affecting the Response of the Stack Gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/13/2014	13:28:22	2/13/2014	13:43:52	0:15:30	89	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/13/2014	22:22:06	2/13/2014	22:33:27	0:11:21	90	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/14/2014	0:20:13	2/14/2014	0:26:53	0:06:40	91	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe	Stack Gas Flow Rate	Span	The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe
2/14/2014	1:27:10	2/14/2014	1:40:00	0:12:50	92	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe	Stack Gas Flow Rate	Span	The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe
2/15/2014	19:54:00	2/15/2014	19:55:53	0:01:53	93	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	19:57:33	2/15/2014	20:04:12	0:06:39	94	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	20:22:52	2/15/2014	20:31:54	0:09:02	95	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	20:44:31	2/15/2014	20:45:38	0:01:07	96	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	20:49:18	2/15/2014	20:50:28	0:01:10	97	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	20:55:18	2/15/2014	20:56:07	0:00:49	98	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/15/2014	21:01:32	2/15/2014	21:04:20	0:02:48	99	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	21:08:38	2/15/2014	22:17:17	1:08:39	100	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	22:53:49	2/15/2014	23:00:34	0:06:45	101	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	23:36:27	2/15/2014	23:40:16	0:03:49	102	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/15/2014	23:44:03	2/16/2014	0:05:07	0:21:03	103	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	0:18:48	2/16/2014	0:25:23	0:06:35	104	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	2:12:03	2/16/2014	2:12:57	0:00:54	105	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	2:51:13	2/16/2014	2:52:42	0:01:29	106	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	3:05:41	2/16/2014	3:06:54	0:01:13	107	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/16/2014	3:14:44	2/16/2014	3:16:07	0:01:23	108	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	3:41:16	2/16/2014	3:42:03	0:00:47	109	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	3:45:42	2/16/2014	3:46:55	0:01:13	110	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	4:15:19	2/16/2014	4:16:53	0:01:34	111	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	4:57:28	2/16/2014	4:59:03	0:01:35	112	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	5:05:37	2/16/2014	5:06:10	0:00:33	113	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	5:17:48	2/16/2014	5:18:13	0:00:25	114	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	5:57:40	2/16/2014	5:58:19	0:00:39	115	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	6:19:15	2/16/2014	6:20:20	0:01:05	116	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/16/2014	6:42:52	2/16/2014	6:43:27	0:00:35	117	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	6:49:35	2/16/2014	6:50:38	0:01:03	118	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	7:14:05	2/16/2014	8:54:07	1:40:02	119	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	8:58:06	2/16/2014	10:13:01	1:14:55	120	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	10:25:10	2/16/2014	10:37:25	0:12:15	121	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	11:06:27	2/16/2014	11:22:42	0:16:15	122	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	16:49:09	2/16/2014	17:21:16	0:32:07	123	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/16/2014	17:37:35	2/16/2014	18:11:23	0:33:48	124	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the North Coupled with Cold Temperatures Caused Water Droplets to Form in the Stack and Contact the Stack gas Probe	Stack Gas Flow Rate	Span	The Kiln Was Switched to Oil and the ID Fan Adjusted to Try to Minimize Water Droplet Movement
2/17/2014	18:42:59	2/17/2014	18:43:43	0:00:44	125	Malfunction	The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur, Affecting the Rear Chamber Pressure System	Back Chamber Pressure, 1 Second Delay	Opl	Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements

NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
02/13/14 - 02/20/14

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/18/2014	23:13:50	2/18/2014	23:14:32	0:00:42	126	Malfunction	Instantaneous Upper Instrument Setpoint Was Reached for Scrubber Recirc. Rate Span Due to the Flow Meter Becoming Dirty With Soda Ash Solids	Scrubber Recirc. Rate	Span	I&E Cleaned the Flow Meter and Checked the Calibration for Proper Operation